

RH TRU Waste Second NOD Comment/Response Matrix

Item	Comment	Response
Letter	NMED is therefore directing the Permittees to continue development of an approach that would address both CH and RH waste characterization in a unified manner, through a consolidated response and a revised PMR. As a result, the attached NOD comments address only the non-characterization aspects of the current RH PMR, such as inspections, preparedness and prevention, contingency plan, and traffic patterns.	The Permittees are developing an approach that would address both CH and RH waste characterization in a unified manner, through a consolidated response and a revised PMR.
Letter	NMED understands that the Permittees may also wish to include other proposed changes not previously identified in the Section 311 or RH PMRs, such as a request for additional storage capacity in the Parking Area and Waste Handling Building Units and the designation of separate “holding areas” for waste containers pending Section 311 confirmation at the WIPP facility. To the extent any of these changes may supplant information in other PMRs currently before NMED, the Permittees will need to determine the appropriate course of action to ensure NMED does not consider inconsistent submittals.	Storage and staging area changes are set forth in the consolidated submittal. The Permittees will take appropriate actions to assure NMED does not consider inconsistent submittals.
Letter	NMED encourages the Permittees to continue informal discussions with NMED to seek clarification of any aspect of either this NOD or the Section 311 NOD during the development of the consolidated response and revised PMR. NMED strongly encourages the Permittees to involve interested members of the public in similar discussions and briefings during this time.	The Permittees have arranged additional meetings with both the NMED and with various stakeholder groups prior to the revised submittal.

Item	Comment	Response
Letter	Because NMED is directing the Permittees to consolidate their responses to the Section 311 NOD and this NOD, we hereby extend the response timeframe for the Section 311 NOD, and therefore the consolidated response, until April 29, 2005. Please develop a response to all deficiencies identified in the attached NOD comments and the Section 311 NOD, and submit this consolidated response along with a revised PMR to NMED by this date. Be advised that the Permittees must include complete and robust justifications supporting the revised PMR in their response.	The Permittees have assembled the responses for both the Section 311 and RH NODs and are presenting them to NMED with a combined Section 311/RH revised PMR. The revised PMR includes descriptions and justifications for the requested modifications, including supporting documents as applicable.
Letter	Finally, because this revised PMR is expected to reflect a substantial departure from the original PMRs (i.e., Section 311; RH), NMED also directs the Permittees to issue a public notice for a sixty-day comment period on the revised PMR and to hold public meetings in Carlsbad and Santa Fe. Although there is no clear regulatory requirement for this public comment period, NMED expects public interest will be high in this revision. NMED notes that the Permittees have already indicated their willingness to comply with this request.	The Permittees will issue a public notice with a 60-day public comment period and will hold public meetings in Carlsbad and Santa Fe.
Comment 7-2.	<p>The NOD response matrix maintenance schedule for the 41-Ton forklift specifies quarterly, semi-annual and annual maintenance. The PMR, page 7-10 indicates an hourly, quarterly, and annual maintenance schedule. Please resolve this inconsistency.</p> <p>In addition, DOE in Table D-1a provides a list of</p>	<p>The 41-Ton Forklift is inspected after either 100 hours of use, 500 hours of use, or after 5 years whichever comes first. Table D-1a has been revised to reflect this information.</p> <p>In addition, the Permittees have elected to modify Table D-1a to include what checks (i.e., inspection criteria) are performed on each piece of equipment listed in that Table. Referenced procedures will be maintained in the WIPP Operating Record.</p>

Item	Comment	Response
	<p>procedure numbers associated with the inspection of each piece of the RH TRU equipment. However, these procedures are not included in the PMR, making it virtually impossible to evaluate the criteria the inspector uses to check the equipment. Most of these procedure numbers were associated with preoperational inspections or maintenance. Provide copies of the procedures specified in Table D-1a, or, alternatively, modify Table D-1a to include the relevant inspection criteria.</p>	
<p>Comment 7-3.</p>	<p>While there are several places in the text of the PMR where it would be appropriate to document the aisle space of 48 inches (e.g., page 7-7, Attachment E, E-1b, Aisle Space Requirement), the related wording indicated in the NOD response matrix to Comment 7-3 could not be located in the revised PMR. The Permittees must ensure the language specified above is included in appropriate attachments.</p>	<p>Where appropriate, an aisle space of 48 inches has been documented. However, a 48- inch aisle space is not always applicable. Aisle space requirements have been included in the following locations in the PMR: Permit Condition III.A.1.f Permit Condition III.A.1.i Permit Condition III.A.2.e Section E-1b and Section M1-1c(1)</p>
<p>Comment 8-1.</p>	<p>Inconsistencies in the descriptions of waste containers and the areas that the Permittees are proposing to use for the management of RH wastes prevent NMED from verifying the adequacy of the secondary containment volume calculations. These concerns are summarized below:</p>	<p>See below.</p>
<p>8-1.1</p>	<p>On page 14a-7 (lines 6-12), the PMR describes an RH canister, referred to as RH-72B canister, in the text of the paragraph. On line 20-21 the PMR refers to an RH-72B and/or the CNS10-160B shipping cask. On page 14a-9 the PMR discusses an RH-72B shipping cask. This is very confusing. While it appears that an RH-72B</p>	<p>Inconsistencies have been corrected and casks are defined in Section M1-1c(1) and are referred to throughout the PMR as either RH-TRU 72-B or CNS 10-160B.</p> <p>Section M1-1b has been revised to describe the containers, including canisters, that will be used.</p>

Item	Comment	Response
	<p>canister and an RH-72B cask may not be the same, it is not clear. In addition, not all types of containers managing RH-waste are described in Section M1-1b, <u>Description of Containers</u>. Describe all containers, casks, canisters, and large canisters that may be used to manage RH waste.</p>	
8.1.2	<p>The terms CNS10-160B shipping cask and 10-160B shipping cask appear to be used interchangeably throughout Attachment M1, and in fact Figure M1-21 is entitled 10-160B shipping cask. The PMR should clarify if these terms refer to the same shipping casks or are different casks. If they are different types of casks used for the management of RH waste then the PMR should address both.</p> <p>In addition, the CNS10-160B and/or 10-160B are not described in Section M1-1b <u>Description of Containers</u>. Provide description of these containers in this section, or explain why their description is not needed here.</p>	<p>The terms for casks are now consistent. They are: RH-TRU 72-B and CNS 10-160B.</p> <p>Figures now reflect a consistent nomenclature for casks.</p> <p>Consistent with the existing permit, shipping packages are described in Section M1-1c(1) not in Section M1-1b. Casks are described in Section M1-1c(1) and shown in Figures M1-18, M1-19, M1-20, and M1-21.</p>
8.1.3	<p>Page 14a-7, line 10, indicates that “larger canisters” may be used to overpack other containers...”. These large RH canisters are not described in Section M1-1b, Description of Containers. In addition, and more importantly, these canisters were not taken into consideration when determining the secondary containment calculations for the Hot Cell and Transfer Cell. Provide both a description of the larger canisters, and include them in the secondary containment calculations.</p>	<p>The term “large canister” has been removed from the PMR and replaced with the term “RH TRU facility canister” and is described in Section M1-1b. The RH TRU facility canister was considered in the secondary containment calculations. However, the directly loaded RH canister contains the larger volume and therefore was used in the calculations.</p>

Item	Comment	Response
8.1.4	Page 14a-7, line 17 and elsewhere, discusses “drum carriage units” associated with the CNS10-160B shipping cask. These items are not adequately described in the PMR.	Drum Carriage Units are now described in detail within the PMR and shown in Figure M1-25.
8.1.5	The PMR did not address the request to provide container configuration diagrams that show the maximum amount of waste that can be managed in the rooms and cells. Provide the requested diagram configurations for all RH management units.	Container configuration diagrams for areas within the RH Complex are now included in the PMR as Figures M1-14a, M1-17a, M1-17b, and M1-17c.
Comment 8-2.	In response to the question to provide more detailed information on the backup systems in the RH Complex, the Permittees provided an incomplete reference to “Permit Section A-4” (which might be “Permit Attachment A, Section A-4” located in Section 4 of the response). The Permittees indicate that this section of the WHB facility description has to be modified. However, apparently no modifications were provided in Attachment E “Preparedness and Prevention” or Attachment F “Contingency Plan” as indicated in the response matrix.	<p>The backup power systems are now described in detail in Section E-2d. There are no additional physical changes to the facility required with regards to backup power systems.</p> <p>There are no further physical modifications to the RH Complex that would require a permit modification.</p>
Comment 8-4.	Chapters D and F were not modified to contain airflow system descriptions as specified in the NOD response matrix. Revise accordingly.	Section E.2.e has been revised to include additional detail regarding the airflow system in the RH Complex.
Comment 9-1.	40 CFR §264.52(f) requires that the Contingency Plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. Since 40 CFR §264.50 (Applicability) indicates that the Subpart applies to owner and operator of all hazardous waste facilities, the PMR must provide evacuation routes and alternative evacuation routes for <u>all</u> regulated units. The	<p>An evacuation plan for the WHB and RH Complex, which includes evacuation routes and an alternate evacuation routes, are now included in the submittal as Figures F-8, F-8a and F-8b.</p> <p>The statement that the WHB is not a “normally occupied area” has been removed from the submittal.</p>

Item	Comment	Response
	<p>PMR states that the WHB is not considered a normally occupied area, and evacuation routes are maintained and mapped for “normally occupied areas”. The WHB (a regulated unit) has hazardous waste workers that are in the building and work in and around the RH-TRU handling areas (other areas of the PMR indicate that workers perform inspection and maintenance of the RH areas). Provide evacuation route and alternate evacuation route as previously requested.</p>	
<p>Comment 10-3.</p>	<p>The Permittees indicated that the original Part B permit application, Chapter B, Section B-4, provides substantiating data to support the use of NRC-certified shipping casks and is the basis for calculations provided in the matrix which provide calculations regarding on-site roads, new traffic conditions, and new traffic condition calculations. NMED used portions of Section B-4 to develop Permit Attachment G in the existing permit. The technical information provided in the matrix in response to traffic pattern comments is adequate, however the PMR must be revised to explicitly include this information.</p>	<p>Section G-1 of the submittal has been revised to include the necessary calculations to verify that the roadways are capable of supporting the additional weight requirements requested within the PMR.</p>
<p>Comment on Supplement 3.</p>	<p>The Permittees need to determine whether prior NMED comments on Supplement 3, “Maximum VOC Emission Rates from RH Canisters”, are still relevant in light of the anticipated manner in which VOC emissions will be monitored under Section 311 requirements.</p>	<p>The revised approach to VOC monitoring as defined in Module IV and Attachment N precludes the necessity to take into account the maximum VOC emission rates from RH canisters.</p>